

UNITED STATES OF AMERICA,

Plaintiff,

V.

ABDIRIZAK MOHAMED WARSAME,

Defendant.

## INFORMATION

(18 U.S.C. § 2339B(a)(1))

THE UNITED STATES ATTORNEY CHARGES THAT:

**COUNT 1**

(Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization)

Beginning on or about March 1, 2014, and continuing until on or about April 3, 2015, within the State and District of Minnesota, and elsewhere, the defendant,

ABDIRIZAK MOHAMED WARSAME,

did unlawfully and knowingly conspire and agree with others both known and unknown to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), including himself, as personnel, to a foreign terrorist organization, namely, ISIL (the Islamic State of Iraq and the Levant), which was a designated foreign terrorist organization at all times relevant to this Information, knowing that the organization was a designated foreign terrorist organization, and knowing that ISIL

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has engaged, and engages, in terrorist activity and terrorism; all in violation of Title 18,  
United States Code, Section 2339B(a)(1).

Dated: February 4, 2016

ANDREW M. LUGER  
United States Attorney

A handwritten signature in black ink, appearing to read "Andrew R. Winter". The signature is fluid and cursive, with the first name "Andrew" and last name "Winter" clearly distinguishable.

BY: ANDREW R. WINTER  
Assistant United States Attorney  
JOHN DOCHERTY  
Assistant United States Attorney